

DANIEL G. BOGDEN
United States Attorney
District of Nevada
JIAMIN CHEN
Assistant United States Attorney
333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
702-388-6336

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	Case No.: 2:15-cr-00064-APG-CWH
Plaintiff,)	
)	
vs.)	STIPULATION FOR PROTECTIVE
)	ORDER
LETICIA CASTRO and JIMMY MATUTE,)	
)	
Defendants.)	

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Jiamin Chen, Assistant United States Attorney, and Brian Pugh, counsel for defendant LETICIA CASTRO, that this Court issue an Order protecting from disclosure to the public any documents disclosed which contains personal identifying information such as account numbers, Social Security numbers, drivers license numbers, dates of birth, Email addresses, or physical addresses, of participants, witnesses, and others in this case. Such documents shall be referred to hereinafter as "Protected Documents."

The parties state as follows:

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1 1. Certain information contained in discovery materials to be disclosed by the
2 government and defendant includes or may include personal identifiers, including account
3 numbers, Social Security numbers, drivers license numbers, dates of birth, Email addresses, and
4 physical addresses, of participants, witnesses, and others.

5 2. Discovery in this case is voluminous. Many of the documents include personal
6 identifiers. Redacting the personal identifiers of participants, witnesses and others would
7 prevent timely disclosure of this material.

8 3. As part of discovery production, the United States may produce Protected
9 Documents to the defendant without redacting the personal identifiers of participants, witnesses,
10 and others, with the possible exception of certain materials it reserves the right to produce in
11 redacted form.

12 4. Access to Protected Documents will be restricted to persons authorized by the
13 Court, namely Defendant, attorneys of record, and their associated counsels, paralegals,
14 investigators, experts, and secretaries employed by the attorneys of record and performing
15 services on behalf of Defendant.

16 5. The following restrictions will be placed on the above-designated individuals
17 unless further ordered by the Court. The above-designated individuals shall not:

18 a. make copies for, or allow copies of any kind to be made by any other person of
19 Protected Documents, or allow the Protected Documents to be otherwise disseminated;

20 b. allow any other person to read Protected Documents; and

21 c. use Protected Documents for any other purpose other than preparing to defend
22 against the charges in the Indictment or any further superseding indictment arising out of this
23 case.

6. Defendant's attorney shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as account numbers, Social Security numbers, drivers license numbers, dates of birth, Email addresses, and physical addresses during the trial of this matter.

8. Upon initiation and conclusion of this matter, Defendant's attorney shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as account numbers, Social Security numbers, drivers license numbers, dates of birth, Email addresses, and physical addresses within a reasonable time, not to exceed thirty days after Defendant has exhausted all appellate rights.

DANIEL G. BOGDEN
United States Attorney

Date: 3-16-15


JIAMIN CHEN
Assistant United States Attorney

Date: 3-12-15


BRIAN PUGH
Counsel for Defendant

IT IS SO ORDERED this 19th day of March 2015.


UNITED STATES MAGISTRATE JUDGE